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d.b.a. Rota Handicraft and Lee Byung Deuk

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF THE NORTHERN MARIANA ISLANDS

SAIPAN HANDICRAFT,

Plaintiff,

vs.

MICRONESIA WOODCRAFT ENT., INC.,
ET. AL,

Defendants.

Civil Action No. 05-0040

DEFENDANTS LK CORPORATION
CORPORATION, dba ROTA
HANDICRAFT and LEE
BYUNG DEUK ANSWER TO
PLAINTIFFS FIRST SET OF
INTERROGATORIES

Date:

Time:

Judge: Hon. Alex R. Munson

**TO: Plaintiff, SAIPAN HANDICRAFT, THROUGH HIS ATTORNEY OF RECORD,
KELLEY BUTCHER, Esq., P.O. BOX 504970, SAIPAN, MP 96950-1969.**

COMES NOW Defendants LK Corporation (LK Corp.) and Lee, Byung Deuk (Lee), by and
through undersigned counsel, and hereby answers the interrogatories submitted by
Plaintiff/Counterdefendant Saipan Handicraft pursuant to the Federal Rules of Civil Procedure.

RESPONSE TO INTERROGATORIES

Interrogatory No. 1: State the date in which you first started manufacturing and producing dolls using the name "Bo Jo Bo Wishing Doll."

Rota Handicraft began manufacturing and producing dolls using the name "Bo Jo Bo Wishing Doll" in November 2005.

Interrogatory No. 2: Identify with particularity each contract and agreement, oral and written, that you have with each buyer, supplier of materials, retailer and other businesses for the purchase of LK's dolls or services.

Rota Handicraft has no existing contracts for the purchase, sale or manufacture of LK's dolls or services.

Interrogatory No. 3: Describe in full and complete detail each modification, if any, you have made to the Bo Jo Bo Dolls since the date of first production.

Rota Handicraft modified its hat, nose and skirt as noted and described with particularity in its opposition to Plaintiff's motion for an expanded preliminary injunction.

Interrogatory No. 4: Describe the channels of distribution and/or intended channels of distribution for the Bo Jo Bo Dolls manufactured and/or produced by you.

Rota Handicraft engaged in the manufacture and sale of Bo Jo Bo Dolls in the ordinary stream of commerce to various retail establishments in the Commonwealth of the Northern Mariana Islands.

1 Interrogatory No. 5: Identify each advertising and/or promotional schedules already run, currently
2 running or intended to be run for you[r] Corporation to promote the
3 manufacturing and producing of Bo Jo Bo dolls.

4
5 Rota Handicraft does not engage in advertising or the establishment
6 of 'promotional schedules' for its Bo Jo Bo Dolls.

7
8 Interrogatory No. 6: Identify the person(s) associated with you who are most knowledgeable
9 about sales and promotion and/or the intended sale and promotion of your
10 Bo Jo Bo Dolls.

11
12 Mr. Chong Won Don.

13
14 Interrogatory No. 7: State the annual gross dollar sales you have received from the production
15 and manufacturing of Bo Jo Bo Dolls for each calendar year from the date
16 you first started producing Bo Jo Bo Dolls to the present.

17
18 Rota Handicraft received approximately \$35,000 in 2006 and approximately
19 \$100,000 in 2007.

20
21 Interrogatory No. 8: Identify each company that is any way associated with your manufacturing
22 and production of Bo Jo Bo Dolls and the relationship between you and each
23 such company.

24
25 LK Corporation is licensed to do business as "Rota Handicraft."

26
27 Interrogatory No. 9: Fully and comprehensively state the facts which support your contention that
28 Saipan Handicraft interfered with the contracts between you and you[r]
buyers.

1 Saipan Handicraft knowingly interfered with Rota Handicraft's oral contract
2 with Duty Free Shoppers (DFS) Saipan, Inc.

3
4 Interrogatory No. 10: Identify each person known to you that possesses relevant knowledge
5 concerning your production and manufacturing of Bo Jo Bo Dolls and fully
6 and comprehensive state the substance of the knowledge possessed b each
7 such per[s]ons.

8
9 Mr. Chong Won Don.

10
11 Interrogatory No. 11: Fully and comprehensively identify your damages arising from or
12 based on the allegations in your counterclaim against Saipan Handicraft.

13
14 Rota Handicraft has incurred lost sales in the amount of approximately
15 \$100,000.

16
17 Interrogatory No. 12: Fully and comprehensively explain how you calculate the damages you
18 claim to have suffered arising out of or based on the allegations in [y]our
19 counterclaim.

20
21 Rota Handicraft calculates its approximate damages based on its former
22 sales which were lost when Saipan Handicraft interfered with its business
23 relationship with DFS Saipan, Inc.

24
25 Interrogatory No. 13: Identify each person known to you that possesses relevant knowledge
26 concerning your damages and fully and comprehensively state the substance
27 of the knowledge possessed by each such person.

28
Mr. Chong Won Don.

1 Interrogatory No. 14: Please identify the documentation which supports the damages you claim to
2 have suffered in your counterclaim.

3
4 Rota Handicraft has invoices for sales to DFS Saipan, Inc.

5
6 Interrogatory No. 15: Please identify each person who has ever had an ownership stake in you
7 company including their title, percentage of ownership/membership interest,
8 dates of involvement and capital contribution.

9
10 Defendant/Counterclaimant Mr. Lee Byung Deuk is the sole owner.

11
12
13 Interrogatory No. 16: Please identify each person who has ever been employed by you in
14 connection to the manufacturing and production of Bo Jo Bo dolls and state
15 their title, job description, dates of employment, and most recent contact
16 information.

17
18 Neither LK Corporation nor Rota Handicraft has employees at the present
19 time. Information on former employees will be provided as soon as
20 possible.

21
22 RESPECTFULLY SUBMITTED this 30th day of May 2008 by:

23
24 

25 Steven M. Newman, Esq.
26 Attorney for Defendants/Counterclaimants
27 LK Corporation, dba Rota Handicraft and Lee,
28 Byung Deuk.